

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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|               |   |                             |
|---------------|---|-----------------------------|
| <b>IN RE:</b> | : | CHAPTER 13                  |
|               | : |                             |
| ADA BUNDY     | : | BANKRUPTCY NO: 19-12537-AMC |
|               | : |                             |
| Debtor        | : | HEARING DATE: JULY 30, 2019 |
|               | : | AT 11:00 A.M. COURTROOM 4   |
|               | : | 900 MARKET STREET           |
|               | : | PHILADELPHIA, PA 19107      |

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**NOTICE OF MOTION, RESPONSE DEADLINE AND HEARING DATE**

Corestates Group, LLC has filed a Motion for IN REM Relief from the Automatic Stay of 11 U.S.C. Section 362 and for Special Relief (the “Motion”) with the Court seeking an Order allowing them to exercise any and all legal rights and remedies with respect to the premises located at 6608 North Smedley Street, Philadelphia, PA 19126.

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)**

1. If you do not want the Court to grant the relief sought in the Motion or if you want the court to consider your views on the Motion, then on or before JULY 25, 2019 you or your attorney must do the following:

(a) file an answer explaining your position at:

Clerk United States Bankruptcy Court  
Robert N.C. Nix Building  
900 Market Street, Suite 400  
Philadelphia, PA 19107

If you mail your answer to the bankruptcy clerk’s office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

(b) mail a copy to the movant’s attorney at:

Howard G. Ford, Esquire  
4256 Castor Avenue  
Philadelphia, PA 19124

2. If you or your attorney do not take the steps described in paragraph 1(a) and 1(b) above and attend the court may enter an order granting the relief requested in the Motion.
3. A hearing on the Motion is scheduled to be held before the Honorable Ashley M. Chan, United States Bankruptcy Judge on **JULY 30, 2019 at 11:00 a.m** in Courtroom 4, United States Bankruptcy Court, Robert N.C. Nix Building, 900 Market Street, Philadelphia, PA 19107.
4. If a copy of the Motion is not enclosed, a copy of the Motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).
5. You may contact the Bankruptcy Clerk's Office at 215-408-2800 to find out whether the hearing has been canceled because no one filed an answer.

Date: July 1, 2019

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| <b>IN RE:</b> | : | CHAPTER 13                 |
|               | : |                            |
| ADA BUNDY     | : | BANKRUPTCY NO:19-12537-AMC |
|               | : |                            |
| Debtor        | : |                            |

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**ORDER**

AND NOW, this \_\_\_\_\_ day of \_\_\_\_\_, 2019,  
upon consideration of the Motion for IN REM Relief from the Automatic Stay of 11  
U.S.C. Section 362 and for Special Relief filed by Corestates Group, LLC (the “Motion”)  
and after notice thereof, and an opportunity to be heard, and cause therefore having been  
shown, it is hereby

**ORDERED** that the Motion is **GRANTED**; and it is further  
**ORDERED** that Corestates Group, LLC is granted IN REM relief from the  
automatic stay with respect to the real property at 6608 North Smedley Street,  
Philadelphia, PA 19126. This ORDER shall be binding in any other case filed under  
Title 11 of the United States Code within two years of the date of this Order, unless a  
further Order is entered after notice and a hearing.

**ORDERED** that this Order shall remain in full force and effect in any subsequent  
bankruptcy filed by the debtor herein and Owners’ rights hereunder to recover possession

of the premises located at 6608 North Smedley Street, Philadelphia, PA 19126 shall not be stayed by another bankruptcy filing by any party.

BY THE COURT:

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Honorable Ashley M. Chan  
U.S. Bankruptcy Judge

**IN THE UNITED STATES BANKRUPTCY COURT  
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| <b>IN RE:</b> | <b>:</b> | <b>CHAPTER 13</b>           |
|               | <b>:</b> |                             |
| ADA BUNDY     | <b>:</b> | BANKRUPTCY NO: 19-12537-AMC |
|               | <b>:</b> |                             |
| Debtor        | <b>:</b> | HEARING DATE: JULY 20, 2019 |
|               | <b>:</b> | AT 11:00 A.M. COURTROOM 4   |
|               | <b>:</b> | 900 MARKET STREET           |
|               | <b>:</b> | PHILADELPHIA, PA 19107      |

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**MOTION FOR IN REM RELIEF FROM THE AUTOMATIC  
STAY OF 11 U.S.C. SECTION 362 AND FOR SPECIAL RELIEF**

Corestates Group, LLC, hereinafter referred to as the “Owner,” by and through its undersigned counsel, Howard G. Ford, Esquire, hereby moves this Honorable Court for an Order permitting IN REM relief from the automatic stay pursuant to 11 U.S.C. Section 362 with respect to the property located at 6608 North Smedley Street, Philadelphia, PA 19126, and in support thereof, avers as follows:

1. On April 18, 2019 (the “Petition Date”), Ada Bundy (the “Debtor”) filed a voluntary Chapter 13 petition in the Eastern District of Pennsylvania.
2. Corestates Group, LLC, the Landlord, is the owner of a residential rental property located at 6608 North Smedley Street, Philadelphia, PA 19126 (the “Premises”).
3. Owner entered into an oral renewable one month lease for the Premises with the Debtor, effective March 19, 2019, whereby the Debtor occupied the Premises as tenant (the “Lease”).
4. Pursuant to the Lease, the Debtor is to pay rent of \$800.00 per month to the Landlord.

5. Subsequent to her occupancy of the Premises, the Debtor has failed to pay rent to the Landlord and is in arrears in the amount of \$1600.00 through May 2019. Moreover, Debtor has failed to pay any post-petition rent due, but has continued to occupy the premises.

6. "Cause" exists to grant the Landlord relief from the automatic stay because the Landlord's interest in the Premises is not adequately protected since the Debtor has failed to pay any rent since the Petition Date.

7. Accordingly, the Landlord is entitled to relief from the automatic stay for cause pursuant to Section 362(d) of the United State Bankruptcy Code, to exercise rights, remedies and privileges with respect to the Premises.

8. As a result, Landlord requests that the relief granted pursuant to this Motion be made *in rem* so that any subsequent bankruptcy filing by Debtor will not stay the Landlord from exercising his rights to retake possession of the Premises.

WHEREFORE, Corestates Group, LL respectfully requests that this Court enter an Order: a) vacating the automatic stay of Section 362 of the United States Bankruptcy Code to permit it to exercise all of his rights, remedies and privileges with respect to the Premises; b) making the relief from the automatic stay *in rem* so that the relief given pursuant to this Motion apply in any subsequent bankruptcy proceeding filed

by the Debtor and c) granting such other and further relief as this Court deems necessary and just.

Respectfully Submitted,

*Howard G. Ford, Esquire*

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Howard G. Ford, Esquire  
4256 Castor Avenue  
Philadelphia, PA 19124

Dated: July 1, 2019